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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. 23-CR-00118
Plaintiff,)	STIPULATION TO CONTINUE STATUS
v.)	CONFERENCE AND PROPOSED ORDER
RICHARD SZE,)	
Defendant.)	

Defendant Richard Sze, by and through his counsel, and the United States, by and through undersigned counsel, hereby stipulate and agree as follows:

The above-captioned matter is currently scheduled for a status conference July 11, 2023. The parties have reached a preliminary resolution to the case. The parties therefore agree and jointly request that the status hearing conference now set for July 11, 2023, be converted into a change of plea hearing and set for October 3, 2023. The parties plan to proceed with a change of plea on that date.

The parties stipulate and agree that excluding time from July 11, 2023, through and including October 3, 2023, will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from January

31, 2023, through and including February 14, 2023, from computation under the Speedy Trial Act
outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §§ 3161(h)(7)(A),
(B)(ii)-(iv).

IT IS SO STIPULATED.

DATED: July 10, 2023

Respectfully submitted,

ISMAIL J. RAMSEY
United States Attorney

/s/
SAILAJA M. PAIDIPATY
CHRIS KALTSAS
Assistant United States Attorneys

DATED: July 10, 2023

/s/
FRANK UBHAUS
BERLINER COHEN LLP
Counsel for Richard Sze

~~[PROPOSED]~~ ORDER

With agreement of the parties and for the reasons stated above, the status conference currently set for July 11, 2023, is hereby converted to a change of plea hearing and set for October 3, 2023.

Based upon the facts and representations set forth in the stipulation of the parties, and for good cause shown, the Court finds that failing to exclude the time from July 11, 2023, through and including October 3, 2023, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from July 11, 2023, through and including October 3, 2023, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial.

Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from July 11, 2023, through and including October 3, 2023, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: July 10, 2023


HON. BETH LABSON FREEMAN
United States District Judge